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Karen A. Yarbrough
Cook County Clerk
Date: 09/05/2023 11:30 AM Pg: 1 of 3

**IN THE CIRCUIT COURT OF
COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT,
CHANCERY DIVISION**

LAXMI PROPERTIES LLC TERRA)
VITA BARRINGTON LOT,)
)
Plaintiff,)
)
v.)
)
VIJAY ERANKI, MADHURI ERANKI,)
)
)
Defendants.)

PROPERTY ADDRESS: 17 Terra Vita Court, South Barrington, IL 60010-7137

NOTICE OF ACTION INVOLVING REAL PROPERTY
(LIS PENDENS)

Case Number: 2023 CH 07871

The undersigned certifies that the above entitled cause of action was filed on August 31, 2023 and is now pending, and that said cause of action seeks to quiet title for the Real Property described herein and obtain a declaration that the Warranty Deed dated May 12, 2023, recorded on May 19, 2023 as Document Number 2313933043 is a forgery and, therefore, void.

The undersigned further certifies that:

- (i) The names of all plaintiffs and the case number are identified above.
- (ii) The court in which said action was brought is identified above.
- (iii) The name of the purported title holder by virtue of the forged deed of record is Vijay and Madhuri Eranki.
- (iv) A legal description of the real estate sufficient to identify it with reasonable certainty is set forth below:

A. LEGAL DESCRIPTION

LOT 14 IN FINAL PLAT OF TERRA VITA ESTATES SUBDIVISION OF SOUTH BARRINGTON BEING A SUBDIVISION OF PART OF THE EAST ½ OF THE SOUTHEAST ¼ OF SECTION 26, TOWNSHIP 43 NORTH, RANGE 9, EAST OF THE THIRD PRINCIPAL MERIDIAN, ACCORDING TO THE

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PLAT THEREOF RECORDED JUNE 18, 1997 AS DOCUMENT NUMBER 97435111 IN COOK COUNTY, ILLINOIS

B. COMMONLY KNOWN AS:

17 Terra Vita Court, South Barrington, IL 60010-7137

C. PERMANENT INDEX NUMBER:

01-26-406-014-0000

(the "Real Property")

The undersigned further certifies that:

- (a) The name and address of the party making said claim and asserting said claim is the plaintiff/claimant identified herein, in care of its counsel of record:

MOMKUS LLP
 c/o Patrick R. Boland
 1001 Warrenville Road, Suite 500
 Lisle, IL 60532
 (630) 434-0400

- (b) Said plaintiff/claimant seeks to quiet title to the Real Property and a declaration that the Warranty Deed dated May 12, 2023, recorded on May 19, 2023 as Document Number 2313933043 is a forgery
- (c) The nature of said claim is described in the Complaint filed in the action identified in the caption above;
- (d) The names of the persons against whom said claim is made are identified as Defendants above;
- (e) The legal description of said real estate appears above;
- (f) The name and address of the person executing this Notice appears below; and
- (g) The name and address of the person who prepared this notice appears below.

RESPECTFULLY SUBMITTED,

Laxmi Properties LLC Terra Vita
Barrington Lot

By: 
 One of Its Attorneys

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Prepared by/Executed by/Return to:

MOMKUS LLP
c/o Patrick R. Boland
1001 Warrenville Road, Suite 500
Lisle, IL 60532
Ph: (630) 434-0400; Fax: (630) 434-8376
Email: pboland@momkus.com

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